

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PPF MANAGEMENT LLC  
Plaintiff,

v.

OJSC SBERBANK OF RUSSIA  
SBERBANK CAPITAL  
SBERBANK CIB USA, INC.  
NEO CENTRE  
PROMSVYAZBANK PAO  
JSC NATIONAL AGGREGATES COMPANY  
KLEVER ASSET MANAGEMENT  
KLEVER INTERNET INVESTMENT  
ALETARRO LTD.  
NISORAM HOLDING LTD.  
URASAY LTD.  
MOSTRA CONSULTING LTD.  
SUINTEX LTD.  
GERMAN GREF  
OLEG GREF  
ASHOT KHACHYATUREANTS  
YURIY ZHUKOV  
GREGORY SHIRIN  
KIRILL NOGOTKOV  
ALEXEY BAZARNOV  
ZOYA GALEEVA  
SERGEY KUBLITSKIY,

Defendants.

**C.A. No.**

**CONFIDENTIAL  
FILED UNDER SEAL PURSUANT  
TO Fed. R. Civ. P. 5(d)**

**DO NOT ENTER ON PACER  
DO NOT PLACE IN PRESS BOX**

**DECLARATION OF CAROLINE HELLER IN SUPPORT OF**

**PPF MANAGEMENT'S MOTION TO SEAL FILE**

I, Caroline Heller, hereby declare:

1. Pursuant to the Rule 5(d) of the Federal Rules of Civil Procedure, PPF Management LLC ("Plaintiff" or "PPF Management") made an application to this Court to file certain documents

under seal in this matter and to maintain same under seal until Plaintiff has reasonable time to make service on all, or most, of the Defendants.

2. Specifically, Plaintiff seeks to file under seal: (1) PPF Management's Motion to Seal File (and the exhibit thereto); (2) Declaration of Caroline Heller; (3) PPF Management's Complaint; (4) PPF Management's Rule 7.1 Disclosure Statement.

3. The primary basis for the request to seal the documents is the likelihood that the Defendants will seek to evade service. The majority of the Defendants has to be served in the Russian Federation, and they are high profile individuals. Absent sealing and due to the inherent delay in sending the original summonses to other jurisdictions, there is a greater than normal risk that the Defendants will attempt to evade service in response to advance notice of the Complaint. Thus, such notice will severely prejudice Plaintiff's ability to make service.

4. The fair opportunity to serve the Compliant constitutes a compelling interest to seal the Complaint and related documents for a short period of time. Service is the threshold to securing their presence in this Court and in receiving a fair trial.

5. Moreover, there are neither reasonable alternatives to sealing the Complaint until the service is effectuated that would adequately protect PPF Management's interest, nor any immediate need for public access to the Complaint that outweighs the prejudice PPF Management would suffer were the Complaint to be made public.

I declare under penalty of perjury that the foregoing Declaration is true and correct to the best of my knowledge.

Executed on November 22, 2016.

**Dated: November 22, 2016**

**Respectfully Submitted,**



Caroline Heller  
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**Counsel for PFF Management LLC**